

# EXHIBIT 5

GREGORY ANGLIN  
IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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DEAN OBEIDALLAH, )  
 )  
Plaintiff, )  
 )  
vs. ) Case No.  
 )  
ANDREW B. ANGLIN, et al., ) 2:17 CV 720  
 )  
Defendants. )  
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Wednesday, October 31, 2018  
Tyack Law Firm  
536 South High Street  
Columbus, Ohio 43215

DEPOSITION OF GREGORY ANGLIN

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Jackie Olexa White  
Registered Merit Reporter  
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Job No. 150002

1 GREGORY ANGLIN

2 asked -- he told me he had a subpoena. I said, can 09:00:49  
3 you meet at my office in an hour, and he said yes, 09:00:52  
4 and we did. 09:00:55

5 Q. What is your office address? 09:00:56

6 A. It's 6827 North High Street, Suite 121, 09:01:02  
7 Worthington, Ohio. 09:01:06

8 Q. Do you share that office space with 09:01:08  
9 anybody? 09:01:09

10 A. My particular office Suite? 09:01:13

11 Q. Yes, sir, Suite 121. 09:01:15

12 A. There are some other counselors there, 09:01:17  
13 yes. 09:01:19

14 Q. What business is resident at Suite 121? 09:01:19

15 A. Well, there is an office psychiatric, 09:01:25  
16 which is a counselor that is there. There is Hope 09:01:29  
17 Recovery, which is another counselor that's there, 09:01:36  
18 and myself and some gentlemen that do some sort of 09:01:39  
19 business consulting. 09:01:45

20 Q. And do you know those gentlemen's business 09:01:47  
21 name or personal name? 09:01:49

22 A. Robert is the only thing I remember of his 09:01:51  
23 name, yes. 09:01:53

24 Q. Do you have any understanding as to what 09:01:54  
25 type of business consulting occurs? 09:01:56

1 GREGORY ANGLIN

2 not asking for any conversations between you and me. 09:04:13

3 THE WITNESS: Right. 09:04:17

4 A. I'm sorry, could you ask the question one 09:04:23  
5 more time? 09:04:25

6 Q. I would like to understand what efforts 09:04:25  
7 you undertook to identify whether or not you 09:04:27  
8 possessed documents responsive to the five requests 09:04:30  
9 detailed in Exhibit 1. 09:04:33

10 A. Well, I carefully read them, and it was my 09:04:34  
11 understanding I did not have any copies of anything 09:04:40  
12 that had been requested. 09:04:42

13 Q. Do you maintain files related to your 09:04:46  
14 businesses at the Suite 121 address we spoke about 09:04:49  
15 earlier? 09:04:54

16 A. No, I do not. 09:04:54

17 Q. Where do you maintain documents related to 09:04:55  
18 your businesses? 09:04:58

19 A. At my personal residence. 09:04:58

20 Q. Do you use email for your business? 09:05:03

21 A. Well, I'm retired, so I don't really do 09:05:06  
22 much business. 09:05:10

23 Q. Have you ever used email related to your 09:05:12  
24 businesses in the last five years? 09:05:15

25 A. I mean, I'm sure I've sent some emails. I 09:05:23

1 GREGORY ANGLIN

2 don't really use email much. It's not really my 09:05:26  
3 thing. 09:05:30

4 Q. Understood. Do you have an email address? 09:05:30

5 A. Yes, I do. 09:05:32

6 Q. What is that? 09:05:33

7 A. It's G R E G O R Y M A R K A N G L I 09:05:33  
8 N@yahoo. 09:05:39

9 Q. And did you review the emails sent or 09:05:42  
10 received from that address in connection with the 09:05:46  
11 subpoena? 09:05:49

12 A. I'm not sure I understand what you're 09:05:52  
13 asking. I'm sorry. 09:05:54

14 Q. As part of the efforts to respond to the 09:05:55  
15 subpoena, did you log into your email account and 09:05:57  
16 determine whether or not there's any emails, 09:06:00  
17 correspondence, documents, responsive to the subpoena 09:06:02  
18 in your email inbox? 09:06:05

19 A. Oh, yes, I did check my email. 09:06:07

20 Q. When did you do that? 09:06:09

21 A. After I received the subpoena. 09:06:10

22 Q. And that analysis revealed that there were 09:06:14  
23 no documents responsive? 09:06:17

24 A. None at all, no. 09:06:18

25 Q. Did you talk to any person you worked with 09:06:23

1 GREGORY ANGLIN

2 in your business to look for responsive documents? 09:06:27

3 A. When you say my business, I'm not sure 09:06:34

4 what you're asking. 09:06:36

5 Q. I believe you said earlier that you work 09:06:38

6 in the counseling business? 09:06:40

7 A. I'm sorry, I retired about five years ago, 09:06:42

8 so I don't do any counseling. 09:06:46

9 Q. Do you still maintain an office address? 09:06:48

10 A. I get my mail sent to the office, my 09:06:51

11 personal mail. 09:06:53

12 Q. Do you have office space at Suite 121? 09:06:54

13 A. No, I do not. 09:06:57

14 Q. Do you ever visit that location? 09:06:58

15 A. To pick up my mail, yes. 09:07:00

16 Q. For any other reason? 09:07:01

17 A. No, I don't think so. 09:07:08

18 Q. Do you pay monthly rental? 09:07:10

19 A. Yes, I do. 09:07:13

20 Q. And what do you understand that payment to 09:07:15

21 represent? Why are you paying rent? 09:07:18

22 A. Well, because I'm still on a lease for 09:07:21

23 another 18 months. 09:07:23

24 Q. Do you have any possessions at that 09:07:27

25 location? 09:07:29

1 GREGORY ANGLIN

2 Q. Do you know of any bank accounts Moonbase 09:13:04  
3 Holdings uses? 09:13:07

4 A. No, I do not. 09:13:08

5 Q. Do you know if Moonbase -- I'll just call 09:13:12  
6 it Moonbase, but you'll know that I'm referring to 09:13:15  
7 the entity Moonbase Holdings, LLC, is that fair? 09:13:19

8 A. Yes, sir. 09:13:23

9 Q. Do you know if Moonbase has any financial 09:13:23  
10 obligations? Has it taken out any loans? Has it 09:13:25  
11 bought any property? 09:13:28

12 A. I don't know. 09:13:29

13 Q. Do you know if Moonbase is still in 09:13:32  
14 existence today? 09:13:36

15 A. I do not know. 09:13:38

16 Q. Have you ever spoken to your son about 09:13:39  
17 Moonbase after that initial conversation where he 09:13:41  
18 told you he was going to set it up? 09:13:44

19 A. I don't recall ever talking to him about 09:13:53  
20 it, no. 09:13:54

21 Q. You talked to him initially when he told 09:13:58  
22 you he was going to create it, correct? 09:14:00

23 A. He told me he was going to create it, yes. 09:14:04

24 Q. And it's your testimony that after that 09:14:07  
25 date and time, you never spoke to him about it again? 09:14:09

1 GREGORY ANGLIN

2 A. Okay. Thank you. When I asked him to -- 09:15:45  
3 he wanted to set up a post office box, and he -- I'm 09:15:59  
4 trying to remember the details of it. He wanted to 09:16:10  
5 establish a post office box, and he set it up under 09:16:15  
6 Andrew Anglin. And I think there was some connection 09:16:22  
7 between those, but I'm really not sure. 09:16:26

8 Q. And what involvement, if any, did you have 09:16:28  
9 in the setting up of a post office box? 09:16:30

10 A. I filled out the application for the 09:16:34  
11 postal service for his post office box. 09:16:35

12 Q. Why did you do that? 09:16:39

13 A. Because being out of the country at the 09:16:40  
14 time, he was unable to set up a post office box, and 09:16:43  
15 I told him I would do it for him. 09:16:48

16 Q. And did you have any understanding 09:16:50  
17 regarding the purpose of setting up a post office 09:16:52  
18 box? 09:16:54

19 A. For him to send his personal mail. 09:16:58

20 Q. Other than that understanding, did you 09:17:08  
21 have any other awareness as to why he needed a post 09:17:09  
22 office box? 09:17:13

23 A. I don't believe I did. 09:17:19

24 Q. Okay. Had you assisted him, prior to the 09:17:20  
25 creation of the post office box, had you ever 09:17:23



1 GREGORY ANGLIN

2 assisted him with securing mail? 09:17:26

3 A. Yes, I had, at -- well, when he began 09:17:29

4 traveling in his 20's, he started using my office 09:17:35

5 address as his mailing address. 09:17:41

6 Q. And is this the address we discussed 09:17:43

7 earlier, Suite 121, 6827? 09:17:46

8 A. That's correct. 09:17:49

9 Q. And did you give him permission to do 09:17:50

10 that? 09:17:52

11 A. I gave him permission to have his personal 09:17:54

12 mail directed to my post office box -- to my office, 09:17:57

13 yes. 09:18:01

14 Q. And how would he retrieve it from the 09:18:02

15 office? 09:18:04

16 A. Well, there wasn't a lot of mail, but when 09:18:08

17 he came in town, I guess he would get it. But there 09:18:11

18 really wasn't much. 09:18:15

19 Q. When you would pick up your mail at Suite 09:18:17

20 121, did you also pick up his mail? 09:18:20

21 A. Yes. 09:18:24

22 Q. Okay. And what did you do with it? 09:18:24

23 A. With his personal mail? 09:18:26

24 Q. Yes, sir. 09:18:27

25 A. I'm trying to remember. We're talking 09:18:48

1 GREGORY ANGLIN

2 about his personal mail -- what mail are we talking 09:18:51

3 about exactly? His personal mail? 09:18:54

4 Q. Other than personal mail directed to 09:18:57

5 Mr. Andrew Anglin what other type of mail was sent to 09:18:59

6 that address? 09:19:03

7 A. Are we talking about the office address or 09:19:07

8 the post office box address, I'm sorry? 09:19:09

9 Q. Right now, sir, we're talking about Suite 09:19:11

10 121, 6827 North High Street. 09:19:13

11 A. Okay. He received legal documents to that 09:19:17

12 address. He received contributions sent to him. I 09:19:20

13 don't know if they were contributions; probably the 09:19:30

14 wrong word. Readers of the Daily Stormer would send 09:19:32

15 money to that address. 09:19:35

16 Q. And I believe you testified earlier that 09:19:38

17 you would pick up this mail. And my follow-up 09:19:40

18 question was: What would you do with it after you 09:19:45

19 picked it up? 09:19:47

20 A. If there were -- I would deposit it into 09:19:49

21 his bank account. 09:19:52

22 Q. Okay. And what bank is that? 09:19:56

23 A. Chase, Chase Bank. 09:19:57

24 Q. And what is the name of the account 09:20:01

25 holder? 09:20:02

1 GREGORY ANGLIN

2 A. Andrew Anglin. 09:20:04

3 Q. And do you have the account number? 09:20:06

4 A. I have it somewhere. I don't know it. 09:20:10

5 I'm sure I could retrieve it. 09:20:14

6 MR. QURESHI: We would make a request for 09:20:16

7 that information, please. 09:20:17

8 And what was the frequency with which you 09:20:21

9 would make deposits on behalf of Mr. Andrew Anglin? 09:20:23

10 A. It varied quite a lot. Perhaps once a 09:20:33

11 month. 09:20:39

12 Q. The address at the Chase Bank where you 09:20:43

13 would make the deposits, do you recall that? 09:20:45

14 A. I don't. It was normally -- well, there 09:20:48

15 were a couple Chase branches that are near my home. 09:20:50

16 So one of them would have been at Graceland Shopping 09:20:53

17 Center. One of them would have been on 09:20:56

18 Dublin-Granville Road. 09:21:00

19 Q. The deposits you would make are in an 09:21:05

20 account held in Mr. Andrew Anglin's name, is that 09:21:08

21 correct? 09:21:11

22 A. That's correct. 09:21:12

23 Q. Was there any business account associated 09:21:12

24 with the funds that you would receive? 09:21:14

25 A. No. 09:21:17

1 GREGORY ANGLIN

2 Q. And I understand that you said it would -- 09:21:20  
3 the amounts would vary, the frequency would vary, 09:21:23  
4 approximately once a month, is that correct? 09:21:26

5 A. Yes. Maybe not quite that often. 09:21:29

6 Q. And going back in time how far? 09:21:32

7 A. Probably five years. 09:21:39

8 Q. Roughly 2013, five years from today? 09:21:42

9 A. Roughly, yes. 09:21:49

10 Q. And what was the order of magnitude of the 09:21:50  
11 deposits you would make on behalf of 09:21:53  
12 Mr. Andrew Anglin? 09:21:55

13 A. I'm not sure I know what that means. 09:21:56

14 Q. I'm just looking for the amounts, sir. 09:21:58  
15 You said you would make deposits once a month, 09:22:00  
16 roughly. I'm trying to understand how big the 09:22:02  
17 deposits were. 09:22:06

18 A. Up until 2000 -- we're going way out of 09:22:10  
19 the -- maybe \$1,500 a month on average up until mid 09:22:16  
20 2017, and then there was a spike in the deposits. 09:22:36

21 Q. A spike increase? 09:22:41

22 A. Increase. 09:22:42

23 Q. To what magnitude? 09:22:43

24 A. You know, I'm just not comfortable 09:22:47  
25 guessing on that. I mean, significantly more than a 09:22:49

1 GREGORY ANGLIN

2 thousand dollars or \$1,500 a month. 09:22:52

3 Q. Was it more than 10,000? 09:22:55

4 A. Yes. 09:22:56

5 Q. More than 25,000? 09:22:57

6 A. You mean average a month? I'm sorry. Oh, 09:23:00

7 no, not average a month. 09:23:02

8 Q. What about an aggregate? 09:23:04

9 A. Again, I'm not sure what you're asking. 09:23:07

10 Q. I'm just trying to get a sense of the 09:23:09

11 total amount of funds that were deposited into the 09:23:11

12 account at Chase Bank. 09:23:15

13 A. Over what period? 09:23:16

14 Q. Since it started, from 2013 through the 09:23:18

15 present. I believe you said for some time it was 09:23:20

16 about 1500 to a thousand dollars a month, but there 09:23:22

17 was a spike. So I think I'm focused now on the 09:23:25

18 spike. How much did it spike to? 09:23:28

19 A. If I had to guess an amount totally 09:23:35

20 deposited, it's a guess. We're allowed to do that, 09:23:38

21 is that right? 09:23:42

22 Q. I'm entitled to your best testimony. If 09:23:43

23 you're telling me your best testimony is a guess, I 09:23:46

24 would like to know what that guess is. 09:23:48

25 A. My guess would be the total deposits were 09:23:50

1 GREGORY ANGLIN

2 between -- let me just think for a moment. My guess 09:23:53

3 would be between, over the five-year period, between 09:24:03

4 100,000 and 125,000 would be my guess total deposits. 09:24:07

5 Q. Bank statements for this particular 09:24:14

6 account, were they also sent to the Suite 121 09:24:16

7 address? 09:24:18

8 A. No, they were not. 09:24:20

9 Q. Do you know where they were sent? 09:24:21

10 A. No, I do not. 09:24:23

11 Q. Did you have any signatory authority over 09:24:24

12 that account? 09:24:26

13 A. No, I did not. 09:24:26

14 Q. Other than depositing funds into the 09:24:28

15 account, did you do anything else with respect to the 09:24:31

16 account, sir? 09:24:33

17 A. No, I did not. 09:24:33

18 Q. Did you ever make any withdrawals? 09:24:36

19 A. No, I did not. 09:24:38

20 Q. Are you still engaging in this activity? 09:24:41

21 A. No, I'm not. 09:24:43

22 Q. When did it cease? 09:24:45

23 A. I think my last deposit was sometime last 09:24:51

24 year. 09:24:54

25 Q. Are you able to approximate when last 09:24:55

1 GREGORY ANGLIN

2 year? When you say last year, it's 2017? 09:24:57

3 A. That's correct. 09:25:00

4 Q. Are you able to approximate when in 2017? 09:25:01

5 A. My best guess would be my last deposit was 09:25:05  
6 December of 2017. 09:25:07

7 Q. And I would like to focus in a little bit 09:25:11  
8 of the particulars of the deposits. 09:25:13

9 MR. TYACK: I'm sorry, just let me 09:25:16  
10 interrupt. You're talking still now about deposits 09:25:17  
11 made into Andrew Anglin's personal account? This has 09:25:20  
12 nothing to do with Moonbase. 09:25:24

13 MR. QURESHI: Well, I'm trying to 09:25:25  
14 understand the relationship between Mr. Anglin and 09:25:26  
15 Mr. Moonbase (sic). I believe he said Mr. Anglin set 09:25:29  
16 up Moonbase. 09:25:32

17 MR. TYACK: Right. But I think to the 09:25:33  
18 extent you're going further than the scope of the 09:25:33  
19 court's order, I would just ask you to use caution 09:25:37  
20 there. 09:25:40

21 MR. QURESHI: I appreciate that. Thank 09:25:41  
22 you. 09:25:42

23 Q. I would like to understand a little bit 09:25:43  
24 about the nature of the funds that you deposited on 09:25:44  
25 behalf of Mr. Andrew Anglin. Was it cash or was it 09:25:48

1 GREGORY ANGLIN

2 checks that were received at Suite 121? 09:25:52

3 A. There was both. 09:25:57

4 Q. Would you say it was evenly split or was 09:25:59

5 there more checks or more cash? 09:26:01

6 A. I didn't really pay attention to that. I 09:26:11

7 couldn't really say. 09:26:13

8 Q. Did you notice any frequency in the people 09:26:15

9 who were sending checks? Were there certain names 09:26:19

10 that seemed more regular than others? 09:26:21

11 A. I don't know that I really paid attention 09:26:28

12 to who was writing the checks. I'm sure that there 09:26:29

13 were people that sent them regularly and people that 09:26:34

14 did not, but I didn't really pay attention to that. 09:26:36

15 Q. So you're unable to identify any name that 09:26:39

16 might have appeared on any check that you deposited 09:26:41

17 over a five-year period? 09:26:44

18 A. I deposited checks into his account 09:27:05

19 written from me. 09:27:08

20 Q. Other than yourself, anybody else whose 09:27:11

21 name you might recall that appeared on a check? 09:27:14

22 A. I don't recall any other names. 09:27:17

23 Q. Do you know if the checks were coming from 09:27:22

24 United States or were they coming from overseas? 09:27:24

25 A. Both. 09:27:29



1 GREGORY ANGLIN

2 Q. Did you ever deposit any foreign currency? 09:27:31

3 A. I deposited foreign currency in to my 09:27:40

4 personal account and then wrote a check for whatever 09:27:44

5 amount that was into my son's personal account. 09:27:48

6 Q. Okay. Do you recall what foreign currency 09:27:53

7 you deposited into your own account and subsequently 09:27:56

8 wrote a check to your son's account? 09:27:59

9 A. The primary foreign courtesy would have 09:28:02

10 been pounds, but there were multiple foreign 09:28:03

11 currencies. 09:28:07

12 Q. This is, again, over the five-year period, 09:28:08

13 2013 to roughly December of 2017? 09:28:10

14 A. That's correct. 09:28:13

15 Q. Were there occasions when you wrote checks 09:28:18

16 to Mr. Andrew Anglin's account other than those 09:28:20

17 instances in which foreign currency was received? 09:28:25

18 A. There were sometimes that I did it with 09:28:31

19 United States currency as well. 09:28:33

20 Q. You would deposit the money received at 09:28:36

21 Suite 121 into your personal account, and then write 09:28:38

22 a check to Mr. Andrew Anglin for deposit in his 09:28:41

23 account? 09:28:45

24 A. That's correct. 09:28:45

25 Q. Okay. Why did you do that? 09:28:45

1 GREGORY ANGLIN

2 A. Because Chase changed their bank policy to 09:28:48  
3 where you could not deposit cash into their account 09:28:53  
4 unless you were the account holder. 09:28:56

5 Q. When did that change occur? 09:28:58

6 A. Maybe at the beginning of 2017. I don't 09:29:10  
7 recall exactly. 09:29:12

8 Q. And the deposits that you made in to your 09:29:14  
9 own account, are those also at Chase, or is it some 09:29:16  
10 other banking institution? 09:29:19

11 A. That was a different banking institution. 09:29:24

12 Q. What institution was it? 09:29:26

13 A. Huntington Bank. 09:29:27

14 Q. Let's turn back to Moonbase, sir. Does 09:29:42  
15 Moonbase maintain any financial records of which you 09:29:45  
16 are aware? 09:29:47

17 A. Not of which I'm aware. 09:29:49

18 Q. Does it have any assets? 09:29:51

19 A. Not that I am aware of. 09:29:54

20 Q. You mentioned at some point that the name 09:29:57  
21 Andrew Anglin was registered as a trade name; do you 09:30:00  
22 recall that? 09:30:03

23 A. Yes, I do. 09:30:03

24 Q. What entity registered it? 09:30:06

25 A. I think Moonbase did, but I'm not certain 09:30:10

1 GREGORY ANGLIN

2 Q. Have you had any discussions with 09:31:21  
3 Mr. Andrew Anglin about the Daily Stormer? 09:31:23

4 A. Yes. 09:31:28

5 Q. Okay. And what do you recall about those 09:31:29  
6 discussions? 09:31:32

7 A. Can you clarify your question a little 09:31:38  
8 bit? What kind of discussions are you asking about? 09:31:40

9 Q. I'm trying to understand if you've spoken 09:31:42  
10 to your son about this website and his role in it, 09:31:44  
11 his involvement in it. What has he told you about 09:31:47  
12 it? That is what I'm trying to get at. 09:31:50

13 A. Well, he writes on the website about 09:31:56  
14 issues and things that I guess are important to him. 09:32:00

15 Q. And who funds the website? Where does the 09:32:04  
16 money for the website come? 09:32:09

17 A. I don't really know how he structures 09:32:12  
18 that. 09:32:15

19 Q. Have you ever spoken to him about that? 09:32:15

20 A. I know that he gets bitcoin, but I don't 09:32:22  
21 know anything about how that works. He has mentioned 09:32:26  
22 bitcoin before, though. 09:32:30

23 Q. And when did he mention bitcoin? 09:32:31

24 A. I don't know. Whenever bitcoin became a 09:32:34  
25 thing. 09:32:36

1 GREGORY ANGLIN

2 Q. But was it this year, 2018? 09:32:37

3 A. No, maybe a year ago. A year, year and a 09:32:41

4 half ago. 09:32:45

5 Q. When is the last time you spoke with him? 09:32:46

6 A. Just a few days ago. 09:32:49

7 Q. And what do you recall about that 09:32:51

8 conversation? 09:32:54

9 A. Just catching up, dad stuff, told him I 09:32:56

10 was mad about having to come in today. 09:32:59

11 Q. Was it a phone call? Was it an in-person 09:33:01

12 meeting? 09:33:03

13 A. Phone call. 09:33:04

14 Q. And where was he calling from? 09:33:04

15 A. I don't know. 09:33:06

16 Q. Did you receive a call on your cell phone? 09:33:08

17 Did you receive a call on your home phone? Where 09:33:10

18 were you when you received the call? 09:33:13

19 A. It was my cell phone. 09:33:15

20 Q. Does your cell phone tell you the incoming 09:33:16

21 number? 09:33:19

22 A. Yes. 09:33:19

23 Q. And what was the incoming number? 09:33:19

24 A. I don't recall. 09:33:21

25 Q. Was it an international number? 09:33:22

1 GREGORY ANGLIN

2 A. No -- I'm sorry, what is the question 09:42:59  
3 again? 09:43:02

4 Q. Have you ever spoken to Miss Karen 09:43:02  
5 Zappitelli about these Articles of Organization for a 09:43:05  
6 Domestic Limited Liability Company that's reflected 09:43:07  
7 in Exhibit 2? 09:43:10

8 A. I'm not sure what the Articles of 09:43:11  
9 Organization are. Is that on this document? 09:43:13

10 Q. Yes, sir. If you turn to Page 2 of 09:43:17  
11 Exhibit 2, you'll see that the title is Articles of 09:43:19  
12 Organization for a Domestic Limited Liability 09:43:24  
13 Company; do you see that, sir? 09:43:27

14 A. Yes. 09:43:29

15 Q. Have you ever spoken to Miss Zappitelli 09:43:29  
16 about this document? 09:43:31

17 A. I don't recall. 09:43:32

18 Q. If you turn to Page 3, you'll notice the 09:43:32  
19 signature at the bottom? 09:43:38

20 A. Yes. 09:43:38

21 Q. Do you remember recognize that signature? 09:43:39

22 A. No, I do not. 09:43:40

23 Q. Do you know if that is your son's 09:43:41  
24 signature, sir? 09:43:42

25 A. I do not know. 09:43:43

1 GREGORY ANGLIN

2 Q. Okay. Did you ever sign this document on 09:43:44  
3 behalf of your son? 09:43:46

4 A. No, I did not. 09:43:49

5 Q. Did he ever ask you to do that? 09:43:51

6 A. No, he did not. 09:43:54

7 Q. Do you see the address under the General 09:43:56  
8 Appointment of Agent section on Page 2? 09:44:02

9 A. Yes. 09:44:05

10 Q. And what is that address? 09:44:05

11 A. 6827 North High Street, Suite 121. 09:44:07

12 Q. That, in fact, is your business address? 09:44:11

13 A. That's correct. 09:44:13

14 Q. And it was your business address in 09:44:13  
15 September of 2016? 09:44:15

16 A. That is correct. 09:44:17

17 Q. Did you give permission for Mr. Andrew 09:44:17  
18 Anglin to use this business address as the 09:44:20

19 Appointment of Agent Address for Moonbase Holdings, 09:44:23  
20 LLC? 09:44:25

21 A. I don't believe I did. I can't say with 09:44:38  
22 absolute certainty, but I don't believe I did. 09:44:40

23 Q. Did he ever tell you he was going to do 09:44:43  
24 this? 09:44:45

25 A. He did tell me he was going to do it. 09:44:45

1 GREGORY ANGLIN

2 Q. Do you have any understanding of a filing 09:47:59  
3 fee associated with the submission of Articles of 09:48:01  
4 Organization for a Domestic Limited Liability 09:48:04  
5 Company? 09:48:07

6 A. I'm sorry, could you say that again? 09:48:11

7 Q. Do you know whether you have to submit a 09:48:13  
8 fee in order to register a company in Ohio? 09:48:14

9 A. Yes, you do. 09:48:16

10 Q. Do you know how Mr. Andrew Anglin 09:48:18  
11 submitted the fee for Moonbase Holdings in September 09:48:20  
12 of 2016? 09:48:22

13 A. It was probably paid by Karen Zappitelli. 09:48:31  
14 I don't know for sure. 09:48:35

15 Q. That was going to be my follow-up 09:48:36  
16 question. What makes you say that? 09:48:38

17 A. Because I paid to reimburse them for this. 09:48:41  
18 And my recollection was that that was a part of the 09:48:48  
19 reimbursement to them. 09:48:51

20 Q. Okay. What's your understanding of the 09:48:52  
21 reimbursement that they sought from you? 09:48:54

22 A. What's my understanding of it? 09:48:59

23 Q. Yes, sir. 09:49:00

24 A. I don't know what that means. 09:49:01

25 Q. Did they call you one day and say, hey, 09:49:03

1 GREGORY ANGLIN

2 write us a check for \$99? How did the process play 09:49:05  
3 out? 09:49:09

4 A. I think she sent a bill, and then I paid 09:49:21  
5 it. 09:49:25

6 Q. Where did she send the bill to? 09:49:26

7 A. That would have been my office address. 09:49:29

8 Q. The 6827 North High Street, Suite 121? 09:49:32

9 A. That's correct. 09:49:37

10 Q. And do you have a copy of the invoice? 09:49:37

11 A. No, I do not. 09:49:41

12 Q. Who was the invoice directed to? 09:49:42

13 A. I don't recall. 09:49:45

14 Q. Was it directed to you? 09:49:46

15 A. I don't recall. 09:49:49

16 Q. Okay. Did you ask any questions before 09:49:50  
17 paying the invoice? 09:49:53

18 A. I don't believe so. 09:50:00

19 Q. Can you help me understand the process 09:50:01  
20 between receipt of invoice and payment of the 09:50:03  
21 reimbursement to Miss Zappitelli? 09:50:07

22 A. Well, I knew that they were setting up an 09:50:10  
23 LLC for my son, and they sent an invoice. I paid the 09:50:15  
24 invoice, and then was reimbursed by my son. 09:50:21

25 Q. And why did you pay the invoice? 09:50:25



1 GREGORY ANGLIN

2 A. Because my son was out of the country. 09:50:28

3 Q. Did he ask you to pay it? 09:50:30

4 A. Yes, he did. 09:50:32

5 Q. And was it in a phone call or an email? 09:50:33

6 How did he communicate that information to you? 09:50:36

7 A. I don't recall. 09:50:42

8 Q. And what understanding did you have about 09:50:45

9 getting reimbursement from your son after you paid 09:50:48

10 this amount? 09:50:51

11 A. Well, I mean, I don't pay any expenses for 09:50:54

12 his adventures here. So he reimburses me for that. 09:50:57

13 Q. What is that understanding based on? Have 09:51:03

14 you talked to him about it or is that just an 09:51:05

15 implicit understanding? 09:51:08

16 A. It's an implicit understanding. 09:51:09

17 Q. How long after you paid the invoice to the 09:51:11

18 Zappitellis for the creation of Moonbase did you 09:51:14

19 receive reimbursement from your son? 09:51:17

20 A. I don't recall. 09:51:20

21 Q. Did he send you a check? 09:51:21

22 A. No. 09:51:23

23 Q. How did you get reimbursed? 09:51:24

24 A. I used cash from money that had been sent 09:51:25

25 to him. 09:51:29

1 GREGORY ANGLIN

2 Q. Okay. Do you keep any accounting or 09:51:30  
3 ledger of the amounts that are sent to him? 09:51:35

4 A. No, I don't. 09:51:39

5 Q. So you just deducted \$99 from a 09:51:41  
6 contribution, and the remainder you deposited in the 09:51:44  
7 account; is that how it worked? 09:51:48

8 A. Yes. 09:51:58

9 Q. Did this occur in September of 2016? 09:52:00

10 A. It looks like it did from the date. I 09:52:03  
11 don't have any recollection of that. 09:52:05

12 Q. The amount that you paid for the creation 09:52:07  
13 of Moonbase Holdings, the \$99, did you write a check 09:52:10  
14 to the Zappitellis? 09:52:14

15 A. My recollection -- and I'm not sure this 09:52:24  
16 is exactly right -- but my recollection was that 09:52:26  
17 their fee was about \$500 total. So I would have 09:52:30  
18 written a check to Zappitellis and then being 09:52:35  
19 reimbursed by my son. 09:52:37

20 Q. The total amount was \$500? 09:52:40

21 A. That is my recollection. 09:52:42

22 Q. The check that you wrote to the 09:52:43  
23 Zappitellis, was that from your account at Huntington 09:52:44  
24 Bank? 09:52:48

25 A. Probably, yes. 09:52:52

1 GREGORY ANGLIN

2 Q. Do you have access to that account? 09:52:54

3 A. No, I do not. 09:52:55

4 Q. Why not? 09:52:57

5 A. It's been closed down. 09:52:58

6 Q. When was it closed down? 09:53:00

7 A. Sometime late last year. 09:53:06

8 Q. And why was it closed late last year? 09:53:07

9 A. I don't know. The bank just closed it. 09:53:11

10 Q. And where do you bank currently? 09:53:15

11 A. FC Bank. 09:53:17

12 Q. FC, Frank -- 09:53:22

13 A. Frank Cathy -- or Frank Cat. Don't want  
14 to mess you up there. 09:53:32

15 Q. You don't have a copy of a canceled check  
16 from Huntington Bank? 09:53:36  
09:53:38

17 A. Do I have a copy of a canceled check, no,  
18 I do not. 09:53:44  
09:53:46

19 Q. Did you get bank statements from  
20 Huntington Bank? 09:53:47  
09:53:49

21 A. I think the only statements I got were  
22 online. That's the best of my recollection. 09:53:54  
09:53:56

23 Q. Other than the \$500 you paid to the  
24 Zappitellis for the creation of Moonbase, have you  
25 paid for any other expenses associated with Moonbase 09:54:06  
09:54:09  
09:54:11

1 GREGORY ANGLIN

2 Holdings, LLC? 09:54:14

3 MR. TYACK: Objection, just in terms of it 09:54:16  
4 was clearly a reimbursement situation. He didn't 09:54:19  
5 actually pay for his son. 09:54:22

6 MR. QURESHI: Okay. 09:54:25

7 MR. TYACK: Just want to make it clear. 09:54:26

8 MR. QURESHI: Yeah, I think the record is 09:54:27  
9 clear on that, that he subsequently was reimbursed 09:54:28  
10 from his son's contributions. 09:54:31

11 A. So the question is: Were there any other 09:54:33  
12 Moonbase expenses that I paid and then was reimbursed 09:54:35  
13 for? 09:54:39

14 Q. Yes, sir. 09:54:40

15 A. Is that the question? 09:54:40

16 Q. Yes, sir. 09:54:41

17 A. I believe there was an expense associated 09:54:46  
18 with registering the trade name Andrew Anglin. 09:54:48

19 Q. Do you recall the amount of that expense? 09:54:53

20 A. No, I do not. 09:54:55

21 Q. Can you describe the mechanics of how that 09:54:57  
22 worked? 09:55:00

23 A. There was some fee involved, and I paid 09:55:03  
24 it. I don't recall whether I paid -- used his cash 09:55:10  
25 to pay the fee, or whether I wrote a check and then 09:55:13

1 GREGORY ANGLIN

2 was reimbursed by Andrew. I don't recall which it 09:55:17  
3 was. 09:55:19

4 Q. And if you had written a check, this was 09:55:20  
5 during a time when Huntington Bank was your bank? 09:55:23

6 A. That is correct. 09:55:26

7 Q. And I'm sorry if I am repeating a 09:55:28  
8 question. Do you recall the amount that you paid? 09:55:30

9 A. No, I do not. 09:55:36

10 Q. Have you spoken to either Karen or John 09:55:41  
11 Zappitelli recently? 09:55:44

12 A. Not recently. Sometime maybe five or six 09:55:50  
13 months ago. 09:55:55

14 Q. What did you talk to them about five to 09:55:56  
15 six months ago? 09:55:58

16 A. A friend of mine had some old coins he 09:55:59  
17 wanted to sell, and I asked John if he had any ideas 09:56:02  
18 about how to do that. 09:56:04

19 Q. Do you recall speaking with them about the 09:56:07  
20 creation of Moonbase Holdings, LLC at any point in 09:56:09  
21 time? 09:56:12

22 A. Not after the initial conversation that I 09:56:13  
23 had with Karen. 09:56:16

24 Q. Do you know whether your son, in fact, did 09:56:17  
25 speak to either Karen or John Zappitelli about the 09:56:20

1 GREGORY ANGLIN

2 A. Okay. 09:58:23

3 Q. Sir, have you seen Exhibit 3 before? 09:58:24

4 A. I don't recall ever having seen this, no. 09:58:26

5 Q. Okay. I'll represent to you it's a letter 09:58:28

6 from the Internal Revenue Service to Moonbase 09:58:31

7 Holdings, LLC, and it's directed to an address that 09:58:33

8 we've talked about earlier today, 6827 North High 09:58:37

9 Street, Suite 121, correct? 09:58:40

10 A. Right. 09:58:43

11 Q. Do you recall ever receiving this document 09:58:44

12 at that address? 09:58:46

13 A. No, I do not recall. 09:58:49

14 Q. Have you had any discussions with 09:58:52

15 Mr. Andrew Anglin about the procurement of an 09:58:53

16 employer identification number for Moonbase Holdings, 09:58:56

17 LLC? 09:58:57

18 A. No, I have not. 09:58:59

19 Q. Do you know whether Moonbase Holdings 09:59:01

20 files tax returns? 09:59:03

21 A. I don't know. 09:59:05

22 Q. Did you provide him any advice or guidance 09:59:06

23 on obtaining an employer I.D. number? 09:59:08

24 A. No, I did not. 09:59:12

25 Q. You mentioned earlier in the day about 09:59:27

1 GREGORY ANGLIN

2 receiving legal documents at the 6827 North High 09:59:29  
3 Street address, Suite 121; do you recall that? 09:59:32

4 A. Yes, I do. 09:59:36

5 Q. And these are legal documents directed to 09:59:37  
6 Mr. Andrew Anglin, is that correct? 09:59:39

7 A. When you say legal documents, I'm talking 09:59:41  
8 about documents that come from attorneys, that have 09:59:43  
9 an attorney return address. 09:59:46

10 Q. Okay. What is your practice with those 09:59:48  
11 documents, what do you do with them? 09:59:49

12 A. I put them in a big plastic tub. 09:59:51

13 Q. And what happens to them afterwards? 09:59:54

14 A. They sit in the tub. 09:59:56

15 Q. You don't forward them on to anybody? 09:59:58

16 A. No, I do not. 10:00:00

17 Q. And what about letters from the Internal 10:00:01  
18 Revenue Service that were directed to that address, 10:00:03  
19 what did you do with those? 10:00:06

20 A. Any mailings that are directed to Moonbase 10:00:07  
21 or Daily Stormer I don't open. 10:00:13

22 Q. What do you do with it? 10:00:16

23 A. Throw them away. 10:00:18

24 Q. Did you put it in the tub or you throw it 10:00:18  
25 away? 10:00:21

1 GREGORY ANGLIN

2 A. I put the attorney stuff in the tub. 10:00:21

3 Anything else I throw away. 10:00:23

4 Q. What is your practice to treat 10:00:25

5 correspondence from the Internal Revenue Service 10:00:27

6 directed to Moonbase? 10:00:29

7 A. That would be throw away. 10:00:30

8 Q. Do you ever have conversations with your 10:00:35

9 son about the fact that he has received 10:00:37

10 correspondence from the Internal Revenue Service that 10:00:40

11 you subsequently have thrown away; have you ever told 10:00:42

12 him that? 10:00:45

13 A. What I have told him is that I will not 10:00:46

14 open any correspondence addressed to Daily Stormer or 10:00:48

15 to Moonbase Holdings. 10:00:52

16 Q. And do you go on to tell him that you will 10:00:53

17 throw it away if it's from the Internal Revenue 10:00:55

18 Service? 10:00:58

19 A. I didn't specify the Internal Revenue 10:00:59

20 Service. What I said was: I will not open any mail 10:01:01

21 sent to Daily Stormer or Moonbase. 10:01:06

22 Q. And what did he say to you in response? 10:01:09

23 A. He said I can get anything I want online, 10:01:11

24 don't worry about it. 10:01:16

25 Q. Okay. And when contributions were 10:01:17



1 GREGORY ANGLIN

2 directed to the 6827 North High Street, Suite 121 10:01:19  
3 address, were they directed to Mr. Andrew Anglin or 10:01:24  
4 were they directed to the Daily Stormer or to 10:01:27  
5 Moonbase? 10:01:31

6 A. They were directed to Andrew Anglin. 10:01:31  
7 There was -- almost all were directed to 10:01:34  
8 Andrew Anglin. 10:01:38

9 Q. The instances when they were not directed 10:01:40  
10 to Andrew Anglin, who were they directed to? 10:01:42

11 A. I only recall one directed to the Daily 10:01:46  
12 Stormer of the whole five years. 10:01:48

13 Q. And what did you do with that particular 10:01:50  
14 correspondence? 10:01:53

15 A. Threw it away unopened. 10:01:54

16 Q. Okay. And how did you know it was a 10:01:55  
17 financial contribution? 10:01:57

18 A. I don't know that it was for sure. It 10:01:58  
19 wasn't from an attorney. It could have been a note 10:02:00  
20 of encouragement. I don't know. No, I take that 10:02:03  
21 back. There was another one that I remember that was 10:02:11  
22 a ten dollar check that was made out to Daily 10:02:14  
23 Stormer, and I remember throwing that away. 10:02:17

24 Q. And who was the envelope addressed to? 10:02:20

25 A. The envelope was addressed to Daily 10:02:26

1 GREGORY ANGLIN

2 Stormer. I opened it in error. I saw a ten dollar 10:02:29  
3 check, and I threw it away. 10:02:34

4 Q. Are you aware of any bank accounts held by 10:02:36  
5 Daily Stormer? 10:02:39

6 A. No, I'm not. 10:02:40

7 Q. Are you aware of any bank accounts held by 10:02:42  
8 Moonbase Holdings, LLC? 10:02:45

9 A. No, I'm not. 10:02:47

10 Q. When your son told you he was going to 10:02:48  
11 create an entity called Moonbase, did you ask him 10:02:50  
12 why? 10:02:54

13 MR. TYACK: Objection. We've talked about 10:02:54  
14 this, I think, at some length. 10:02:55

15 MR. QURESHI: Yeah. I think it ties to 10:02:57  
16 the specific line of questioning. I'm not going to 10:02:59  
17 dwell on it. 10:03:02

18 A. No, I did not. 10:03:03

19 Q. What familiarity do you have with the 10:03:14  
20 concept of trade names? What's a trade name? 10:03:16

21 A. I think it's a name you register so that 10:03:22  
22 other people can't use it. I think that is what it 10:03:24  
23 is. 10:03:26

24 Q. And how did you come about this 10:03:27  
25 understanding? 10:03:28

1 GREGORY ANGLIN

2 (Plaintiff's Exhibit 4 was marked for 10:09:33  
3 identification.) 10:09:33

4 Q. Mr. Anglin, I'm handing you a document 10:09:35  
5 that's marked Exhibit 4. 10:09:37

6 A. Okay. 10:09:40

7 Q. Please take a moment to review it. 10:09:41

8 A. Okay. 10:10:00

9 Q. Have you seen this document before, 10:10:00  
10 Mr. Anglin? 10:10:02

11 A. Yes, I have. 10:10:02

12 Q. What is it? 10:10:03

13 A. It is the trade name registration for the 10:10:04  
14 name Andrew Anglin. 10:10:09

15 Q. And what role, if any, did you play in 10:10:11  
16 this trade name registration for the name Andrew 10:10:13  
17 Anglin? 10:10:15

18 A. I applied for the name. 10:10:16

19 Q. On whose behalf? 10:10:19

20 A. Andrew asked me to do it for him. 10:10:22

21 Q. If you turn to the second page of the 10:10:24  
22 document, sir. 10:10:26

23 A. Yes. 10:10:27

24 Q. You'll see under name of the registrant 10:10:28  
25 Moonbase Holdings, LLC? 10:10:31

1 GREGORY ANGLIN

2 A. Um-hum. 10:10:34

3 Q. Did I read that correctly? 10:10:34

4 A. Yes. 10:10:36

5 Q. Is it your understanding you were applying 10:10:36  
6 for the trade name on behalf of Moonbase Holdings? 10:10:38

7 A. That's correct. 10:10:41

8 Q. And you knew that? 10:10:41

9 A. Yes. 10:10:42

10 Q. What other conversations do you recall 10:10:54  
11 with Mr. Andrew Anglin about the registration of his 10:10:55  
12 name as a trade name? 10:10:59

13 A. I don't recall anything else. 10:11:17

14 Q. Okay. Can you describe to me in as much 10:11:20  
15 detail as you recall the request he made of you? 10:11:23

16 A. Well, again, I'm a little bit fuzzy on 10:11:28  
17 this one. I think -- I just don't want to guess. I 10:11:32  
18 don't know. 10:11:38

19 Q. Do you recall a telephone call in which 10:11:39  
20 you had a conversation with him? 10:11:42

21 A. I don't recall the phone conversation. I 10:11:52  
22 know that he asked me to register his name as a trade 10:11:53  
23 name, but I don't recall the conversation. 10:11:57

24 Q. Okay. My question was a little more 10:11:58  
25 basic. It is: Was it a phone conversation? Was it 10:12:01

1 GREGORY ANGLIN

2 a email? Was it a in-person meeting? Do you know 10:12:05

3 how the discussion arose? 10:12:08

4 A. Well, I know it wasn't in person, because 10:12:10

5 he was out of the country. I don't remember whether 10:12:12

6 it was email or phone. 10:12:16

7 Q. Okay. And in the survey of email that you 10:12:19

8 undertook to look for responsive documents did you 10:12:22

9 identify any email related to this topic? 10:12:26

10 A. No, I did not. 10:12:29

11 Q. Is it your practice to delete emails? 10:12:32

12 A. Yes, it is. 10:12:34

13 Q. Both in your inbox and your sent box? 10:12:35

14 A. That's correct. 10:12:38

15 Q. Did you work with the Zappitellis in 10:12:43

16 connection with this trade name registration in 10:12:45

17 Exhibit 4? 10:12:50

18 A. I don't think so. 10:12:57

19 Q. Had you ever done a trade name 10:12:58

20 registration before? 10:13:00

21 A. I may have for Morningstar Counseling, I 10:13:20

22 don't recall. 10:13:23

23 Q. And when you may have performed a trade 10:13:23

24 name registration for Morningstar, did you do it on 10:13:26

25 your own or did you work with an accountant or the 10:13:29

1 GREGORY ANGLIN

2 Zappitellis or consultant? 10:13:33

3 A. I don't have any recollection of that. 10:13:37

4 Once again, we're going back 15 years, 20 years, 10:13:38

5 something like that. 10:13:41

6 Q. Exhibit 4, though, is dated January of 10:13:42

7 2017, is it not? 10:13:44

8 A. I understand that. I was talking about 10:13:45

9 Morningstar. 10:13:47

10 Q. And in connection with Exhibit 4, did you 10:13:48

11 undertake any research to figure out how to do a 10:13:51

12 trade name registration? 10:13:54

13 A. I don't remember -- I don't know how I 10:14:10

14 knew to go to the secretary of state. I don't recall 10:14:13

15 that. 10:14:15

16 Q. Okay. How much time did it take to 10:14:15

17 undertake the trade name registration, sir? 10:14:18

18 A. Again, I just don't recall enough of the 10:14:21

19 details of this. It doesn't look like it would take 10:14:23

20 a lot of time, but I don't recall. 10:14:26

21 Q. Who paid for the registration fee? 10:14:29

22 A. Andrew paid for it. 10:14:32

23 Q. And how did that work? 10:14:34

24 A. He would have -- if I paid cash, then it 10:14:36

25 would have been Andrew's cash. If I wrote a check, 10:14:39

1 GREGORY ANGLIN

2 then Andrew would have reimbursed me. 10:14:42

3 Q. What makes you say that he would have 10:14:45

4 reimbursed you? 10:14:47

5 A. Because he always did. 10:14:48

6 Q. If you look at the second page of 10:14:49

7 Exhibit 4. You'll notice in the right-hand corner it 10:14:51

8 says Date Electronically Filed, January 5, 2017, is 10:14:53

9 that correct? 10:14:59

10 A. Yes. 10:15:00

11 Q. Does that refresh your recollection that 10:15:01

12 this document was electronically filed? 10:15:02

13 A. I just don't remember it. I don't 10:15:08

14 remember how it happened. 10:15:15

15 Q. And if it was electronically filed, sir, 10:15:17

16 do you have a recollection as to whether you 10:15:19

17 submitted credit card information, you provided 10:15:22

18 checking account information in order to pay the \$39 10:15:26

19 filing fee? 10:15:29

20 A. I just don't remember. I don't remember 10:15:30

21 much about this at all. I don't remember how it was 10:15:32

22 paid. I just don't remember the document very well. 10:15:36

23 Q. Okay. If you look at the first box in the 10:15:42

24 left-hand corner on Page 2 of Exhibit 4; do you see 10:15:49

25 that box, sir? 10:15:59

1 GREGORY ANGLIN

2 that's when he began everything. But, yeah I don't 10:43:58  
3 remember. I just don't remember. 10:44:01

4 Q. Subsequent to the trade name registration, 10:44:03  
5 after it was completed did you ever talk to him about 10:44:05  
6 the trade name registration? 10:44:09

7 A. No, I didn't. 10:44:13

8 Q. Have you ever spoken to anyone else other 10:44:15  
9 than your lawyer about the trade name registration of 10:44:16  
10 Andrew Anglin on behalf of Moonbase Holdings, LLC? 10:44:20

11 A. No, I have not. 10:44:26

12 (Plaintiff's Exhibit 5 was marked for 10:44:30  
13 identification.) 10:44:30

14 Q. Mr. Anglin, I'm handing you a document 10:44:31  
15 that has been marked as Exhibit 5. Please take a 10:44:33  
16 moment to review that, sir. 10:44:36

17 A. Okay. 10:44:46

18 Q. Have you seen this document before? 10:44:48

19 A. No, I have not. 10:44:49

20 Q. I'll represent to you, it is a printout 10:44:52  
21 from the Whois Tool for a website entitled 10:44:54  
22 DailyStormer.com. And if you look at the creation 10:44:57  
23 date for the website, it's listed as March 20th, 10:45:02  
24 2013; do you see that? 10:45:07

25 A. Yes, I do. 10:45:08



1 GREGORY ANGLIN

2 Q. And if you continue to read down that 10:45:10  
3 column, you'll see there's an entry for registrant 10:45:13  
4 name? 10:45:16

5 A. Yes. 10:45:16

6 Q. And is that your name listed, sir? 10:45:17

7 A. That is my name listed, yes. 10:45:19

8 Q. Did you have any involvement in the 10:45:22  
9 registration of the website Daily Stormer.com on or 10:45:23  
10 about March 20, 2013? 10:45:27

11 A. Yes, I did. 10:45:31

12 Q. What was that involvement? 10:45:32

13 A. This one I actually remember. I was 10:45:34  
14 sitting in my living room of my condo with my son, 10:45:36  
15 and he told me that he was going to start another 10:45:40  
16 website. And I said, okay. And he asked if he could 10:45:45  
17 use my credit card to register the name. And I asked 10:45:51  
18 how much it was, and it wasn't very much money, so I 10:45:58  
19 said fine. 10:46:02

20 Q. Was it your understanding at the time that 10:46:02  
21 he didn't have his own credit card? 10:46:04

22 A. That's correct. 10:46:06

23 Q. And what bank issued the credit card that 10:46:06  
24 was used to register this website? 10:46:09

25 A. Probably Huntington Bank; although, it 10:46:11

1 GREGORY ANGLIN

2 could have been American Express. I don't know. 10:46:16

3 Q. What else do you recall about that 10:46:20

4 conversation? 10:46:22

5 A. Just that I had no idea I was going to be 10:46:26

6 the registrant of a website that he was going to run. 10:46:28

7 Q. Do you recall whether he entered the 10:46:33

8 information related to the creation of the website or 10:46:38

9 is that something you did? 10:46:41

10 A. He would have entered everything, and then 10:46:42

11 asked me for my credit card. 10:46:44

12 Q. Do you have any understanding as to why he 10:46:46

13 listed you as the registrant? 10:46:48

14 A. I have no idea. 10:46:49

15 Q. Did you ever ask him about that? 10:46:51

16 A. Yeah. 10:46:52

17 Q. And what was that conversation like? 10:46:53

18 A. Well, the conversation was -- let me think 10:46:54

19 for just a minute. When I realized I was the 10:47:00

20 registrant, we had a very direct conversation where I 10:47:07

21 told him I was very disappointed in him that he 10:47:13

22 allowed that to happen, and that I wanted it removed 10:47:16

23 immediately. 10:47:19

24 Q. And, sir, when did that occur? 10:47:20

25 A. I didn't even find out about it until 10:47:22

1 GREGORY ANGLIN

2 sure that the record is clear here. The domain name 11:00:51  
3 was registered in March of 2013, correct? 11:00:54

4 A. Yes, that's correct. 11:00:57

5 Q. On the internet? 11:00:58

6 A. That's correct. 11:01:00

7 Q. And it listed you -- the registration 11:01:01  
8 listed you as the registrant, the administrator, and 11:01:04  
9 the technical contact, correct? 11:01:09

10 A. That's correct. 11:01:10

11 Q. And that's all reflected on Exhibit 5? 11:01:11

12 A. That's correct. 11:01:14

13 Q. And at some point after the registration 11:01:15  
14 of the domain name reflected on Exhibit 5, you 11:01:18  
15 expressed disappointment to your son about that fact, 11:01:22  
16 correct? 11:01:25

17 A. That's correct. 11:01:26

18 Q. And my question was: Exhibit 6 is a trade 11:01:27  
19 name registration for Daily Stormer. Did you submit 11:01:30  
20 the trade name registration, Exhibit 6, before or 11:01:35  
21 after you had expressed disappointment to your son 11:01:38  
22 about the internet domain registration? 11:01:42

23 A. I don't recall. 11:01:45

24 Q. When you submitted the trade name 11:01:53  
25 registration for Daily Stormer what did you 11:01:54

1 GREGORY ANGLIN

2 understand you were doing? 11:01:57

3 A. Honestly, I didn't understand anything. 11:02:06

4 What he said was: Can you register this name? He 11:02:08

5 may have said so someone else doesn't use it, I don't 11:02:13

6 remember. 11:02:16

7 Q. Okay. 11:02:17

8 A. I just remember him asking me to do that. 11:02:18

9 Q. At this point in time in December of 2016, 11:02:21

10 had you ever visited the website DailylyStormer.com? 11:02:24

11 A. Yes, I had. 11:02:29

12 Q. Okay. Did you know the content on the 11:02:30

13 website? 11:02:31

14 A. Yes, sir, I did. 11:02:32

15 Q. Had you formed an opinion about whether 11:02:33

16 you agree or disagree with the content? 11:02:35

17 A. Yes, I had. 11:02:37

18 Q. And with that opinion in mind, you agreed 11:02:38

19 to do what your son asked? 11:02:40

20 A. I have a difficult time as a dad sometimes 11:02:51

21 knowing what to support and what not to support. I 11:02:54

22 don't take responsibility for somebody else's 11:02:58

23 actions. He asked me to record this form, and I did. 11:03:01

24 Q. Okay. The filing fee associated with the 11:03:08

25 trade name registration in Exhibit 6, who paid that? 11:03:15

1 GREGORY ANGLIN

2 A. Andrew Anglin paid it. 11:03:21

3 Q. How did Andrew Anglin pay it? 11:03:23

4 A. I don't recall. 11:03:26

5 Q. Do you recall going to the clerk's office, 11:03:26  
6 sir? 11:03:29

7 A. I think I can remember going to a clerk's 11:03:29

8 office on Broad Street or something downtown, and I 11:03:31

9 think it was related to this, but I'm just not 11:03:35

10 positive. And I don't recall whether I paid cash or 11:03:38

11 credit card, I just don't remember. 11:03:40

12 Q. And the visit that you do recall where you 11:03:42

13 went to the clerk's office, the cash or credit card 11:03:44

14 you used, was it yours? 11:03:48

15 A. It would not have been my son's. I never 11:03:51

16 used one of his. Is that your question? 11:03:53

17 Q. Yes, sir. 11:03:56

18 A. No. It would have been mine, yes. 11:03:56

19 Q. To go back to my earlier question: In 11:03:59

20 connection with the trade name registration of Daily 11:04:02

21 Stormer, who paid the filing fee? 11:04:04

22 A. This is the trade name document here, 11:04:09

23 right? 11:04:12

24 Q. Correct. Exhibit 6 is the trade name 11:04:12

25 registration. 11:04:14

1 GREGORY ANGLIN

2 A. No, I do not. 11:18:14

3 Q. Have you ever asked him that question? 11:18:17

4 A. I've never talked to him about Moonbase. 11:18:18

5 Q. In registering the trade name Daily 11:18:21

6 Stormer on behalf of Moonbase, you didn't have a 11:18:29

7 conversation with him? 11:18:34

8 A. Well, I suppose he would have said 11:18:42

9 register it under Moonbase, but that's -- I don't 11:18:45

10 know about the conversation, but I followed whatever 11:18:51

11 his directions were. 11:18:53

12 Q. And registering the name of Andrew Anglin 11:18:55

13 on behalf of Moonbase, that was also a conversation 11:18:59

14 about Moonbase, correct? 11:19:02

15 A. It was a request to register something on 11:19:09

16 behalf of Moonbase. 11:19:11

17 Q. So you would agree that that was a 11:19:13

18 conversation about Moonbase, sir? 11:19:15

19 A. Well, I wouldn't say that we had a 11:19:16

20 conversation about Moonbase, no. I would say exactly 11:19:18

21 that, that he said, can you register this trade name 11:19:23

22 under Moonbase. So if you want to define it as a 11:19:27

23 conversation or not, I wouldn't, but you certainly 11:19:31

24 may, if you like. 11:19:33

25 Q. Okay. Other than those instances, do you 11:19:34

1 GREGORY ANGLIN

2 recall any other instance in which Mr. Andrew Anglin 11:19:38

3 asked you to do something on behalf of Moonbase? 11:19:42

4 A. No, I don't recall anything else. 11:19:45

5 Q. Have you ever understood Mr. Andrew Anglin 11:20:05

6 to describe the financial condition of Moonbase? 11:20:10

7 A. No. 11:20:16

8 Q. Has he ever told you that it's on the cusp 11:20:17

9 of insolvency? 11:20:19

10 A. No. 11:20:21

11 Q. Has he ever said anything else about its 11:20:23

12 financial condition? 11:20:26

13 A. No, he has not. 11:20:26

14 (Plaintiff's Exhibit 8 was marked for 11:20:38

15 identification.) 11:20:38

16 Q. Mr. Anglin, I'm handing you a document 11:20:42

17 that's marked as Exhibit 8. Please take a moment to 11:20:45

18 review it. 11:20:50

19 A. Okay. 11:20:55

20 Q. Have you seen this document before, sir? 11:20:56

21 A. Yes, I filled it out. 11:20:58

22 Q. Okay. And what is it? 11:20:59

23 A. It's an application for a post office box. 11:21:01

24 Q. And why did you fill out an application 11:21:04

25 for a post office box? 11:21:07

1 GREGORY ANGLIN

2 A. On the heels of my conversation that 11:21:11  
3 Andrew needed to remove -- not use my office address 11:21:13  
4 any more, he advised me that he could not set up a 11:21:18  
5 post office box unless he was in the country, and he 11:21:22  
6 was out of the country and asked if I would help him 11:21:25  
7 accomplish that. 11:21:29

8 Q. Did you have an understanding as to where 11:21:30  
9 he was? 11:21:32

10 A. No, I did not. 11:21:32

11 Q. You never asked him? 11:21:33

12 A. No. 11:21:34

13 Q. And the conversation you had with him, was 11:21:42  
14 that over the phone? 11:21:45

15 A. I believe so, yes. 11:21:48

16 Q. And he told you, I'm out of the country, 11:21:49  
17 correct? 11:21:52

18 A. That is correct. Well, he didn't tell me 11:21:52  
19 I'm out of the country. I knew he was out of the 11:21:54  
20 country. 11:21:57

21 Q. And how did you know that he was out of 11:21:57  
22 the country? 11:22:00

23 A. Because he hadn't been back in the country 11:22:00  
24 for five years probably. 11:22:02

25 Q. And how did you know that? 11:22:03



1 GREGORY ANGLIN

2 A. Because he would have come and seen me if 11:22:04  
3 he was in the country. 11:22:06

4 Q. Okay. And did you know where he was? 11:22:07

5 A. No. I know that at some point he spent 11:22:09  
6 time in Thailand over that five-year period, but, no, 11:22:14  
7 I did not know where he was. 11:22:20

8 Q. And you didn't believe it was important to 11:22:21  
9 ask him? 11:22:23

10 A. No, I did not. 11:22:24

11 Q. Why not? 11:22:29

12 MR. TYACK: Objection. Go ahead. 11:22:33

13 A. He's a private person, and I'm a talkative 11:22:38  
14 guy. And so he prefers and I prefer to not know 11:22:46  
15 where he is. 11:22:51

16 Q. Sir, if you look at the document marked as 11:22:54  
17 Exhibit 8, I believe you testified earlier that you 11:22:58  
18 filled out this form? 11:23:01

19 A. Do you mind if I come back to a question 11:23:02  
20 real quick? I want to make sure I said the right 11:23:04  
21 thing. 11:23:06

22 Q. Okay. 11:23:06

23 A. He could have actually been in Russia. I 11:23:07  
24 said Thailand, but I don't know. 11:23:10

25 Q. What makes you think that he may have been 11:23:12

1 GREGORY ANGLIN

2 in Russia? 11:23:14

3 A. I know he had told me he had been in 11:23:16

4 Russia at one time, and I know that he had been in 11:23:18

5 Thailand at one time. 11:23:20

6 Q. And on the one time that he told you he 11:23:22

7 was in Russia, why did he tell you his location then, 11:23:24

8 but not on other occasions? 11:23:27

9 A. That was several years ago, and I think it 11:23:34

10 was -- I don't know why. 11:23:36

11 Q. I believe you testified that he was a 11:23:42

12 private person? 11:23:43

13 A. He is. 11:23:44

14 Q. And you were a talkative person? 11:23:45

15 A. That is what I said. 11:23:47

16 Q. Notwithstanding that, he shared with you 11:23:48

17 his location? 11:23:50

18 A. A number of years ago he did, yes. 11:23:52

19 Q. But more recently he has not? 11:23:54

20 A. That's correct. 11:23:56

21 Q. And you haven't asked him? 11:23:56

22 A. That's correct. 11:23:58

23 Q. If we turn to Exhibit 8, sir, the document 11:24:00

24 that I believe you testified you completed. 11:24:03

25 A. Yes. 11:24:06

1 GREGORY ANGLIN

2 Q. Do you recall when you filled this out? 11:24:08

3 A. No, I do not. This looks like it's dated 11:24:09

4 there, though. 11:24:12

5 Q. And what is the date that you understand? 11:24:13

6 A. Well, let me find it here. 11:24:15

7 Q. There is a date stamp in the right-hand 11:24:18

8 corner. 11:24:20

9 A. Yes, that says December 15, 2017. 11:24:21

10 Q. Sir, in the right-hand corner the date 11:24:32

11 that I make out is January 12, 2017. 11:24:34

12 A. Oh, I'm sorry. 11:24:37

13 Q. Where it's a post office stamp. 11:24:40

14 MR. TYACK: It's hard to read. 11:24:43

15 A. I can read January 12. I can't quite read 11:24:46

16 the year. But if you guys say 2017, I'll go with 11:24:48

17 that. 11:24:51

18 Q. The December date you're referencing, 11:24:51

19 where do you see that? 11:24:53

20 A. That was at the top of my form there. 11:24:55

21 Q. Oh, okay. That's the date on which it was 11:24:57

22 faxed? 11:25:00

23 A. Okay. Sorry. 11:25:01

24 Q. The date in the right-hand corner I see is 11:25:02

25 January 12, 2017. 11:25:04

1 GREGORY ANGLIN

2 A. Okay. 11:25:05

3 Q. Is that consistent with your recollection? 11:25:06

4 A. I don't recall when. It certainly -- I 11:25:08

5 have no reason to believe that is wrong. 11:25:11

6 Q. Okay. And I believe you testified that 11:25:13

7 Mr. Andrew Anglin was out of the country and therefor 11:25:15

8 he requested that you set up a post office box for 11:25:19

9 him? 11:25:21

10 A. That's correct. 11:25:22

11 Q. And did you provide identification to the 11:25:23

12 post office in connection with this process? 11:25:26

13 A. Yes, I did. 11:25:30

14 Q. Did you also pay a sum? 11:25:31

15 A. I did, yes. 11:25:32

16 Q. How much did you pay? 11:25:33

17 A. I don't recall. Maybe \$125, something 11:25:35

18 around that range. 11:25:38

19 Q. And where did that money come from? 11:25:39

20 A. Andrew paid that. 11:25:40

21 Q. And can you describe for us the process by 11:25:42

22 which that occurred? 11:25:44

23 A. Again, I don't recall whether it was paid 11:25:45

24 directly with his cash or whether I paid it and then 11:25:47

25 he reimbursed me. 11:25:50

1 GREGORY ANGLIN

2 Q. And if it was the first option, paid 11:25:51  
3 directly with his cash, how would you have access to 11:25:53  
4 his cash? 11:25:56

5 A. It would be cash that was mailed to Andrew 11:25:57  
6 Anglin that I would still have possession of. 11:26:00

7 Q. And if it was the second option, whether 11:26:06  
8 you paid it and then he later reimbursed you, how 11:26:08  
9 would you have paid for it? 11:26:11

10 A. I could have written a check. I could 11:26:14  
11 have used a credit card. 11:26:16

12 Q. And at this point in time, did you have a 11:26:19  
13 checking account at Huntington Bank, January of 2017? 11:26:21

14 A. No, I did not. 11:26:29

15 Q. Okay. Did you bank at FC Bank at that 11:26:30  
16 point in time? 11:26:34

17 A. Yes, I did. 11:26:35

18 Q. Your checking account was with FC Bank? 11:26:35

19 A. My checking account was. I probably used 11:26:38  
20 a credit card. I don't use checks very often. 11:26:40

21 Q. What credit card might you have used? 11:26:43

22 A. Huntington or possibly American Express. 11:26:46

23 Q. Okay. You testified earlier that 11:26:51  
24 Huntington Bank closed at some point in time? 11:26:55

25 A. My checking account, not my credit card. 11:26:58

1 GREGORY ANGLIN

2 Q. The bank, itself, stayed open? 11:27:01

3 A. I'm sorry? 11:27:03

4 Q. The Huntington Bank institution, itself, 11:27:05  
5 is in existence? 11:27:08

6 A. Oh, Huntington institution, they closed my 11:27:10  
7 accounts. 11:27:12

8 Q. Why did they close your accounts? 11:27:13

9 A. They never said. 11:27:15

10 Q. Did they ever send you any correspondence? 11:27:16

11 A. They just sent me a correspondence that 11:27:19  
12 said we're closing your accounts, no explanation. 11:27:21

13 Q. And did they -- did you have money in the 11:27:25  
14 accounts at the time they closed? 11:27:28

15 A. Yes, they mailed me checks. 11:27:30

16 Q. Did you ever ask them for an explanation? 11:27:33

17 A. Yes, I did. 11:27:36

18 Q. Okay. And I fail to understand. What did 11:27:38  
19 I ask that was funny? 11:27:42

20 A. Yeah, I asked them for an explanation. I 11:27:43  
21 thought it was kind of strange, and they didn't offer 11:27:46  
22 one. 11:27:50

23 Q. Did you ask them in person or in writing? 11:27:51

24 A. Over the phone. 11:27:54

25 Q. Okay. Do you have any understanding that 11:27:56

1 GREGORY ANGLIN

2 the closing of the accounts was related in any way to 11:27:58  
3 your association with Moonbase? 11:28:01

4 A. I don't have any reason to believe that, 11:28:04  
5 no. 11:28:05

6 Q. Any reason to believe that it was because 11:28:06  
7 of your association with Daily Stormer? 11:28:08

8 A. No, I don't have any reason to believe 11:28:10  
9 that either. 11:28:12

10 Q. Did you ever raise this issue with anyone 11:28:19  
11 other than Huntington Bank? 11:28:21

12 A. No. 11:28:26

13 Q. Turning back to Exhibit 8, sir. Might you 11:28:28  
14 describe what you understood to be the reason 11:28:33  
15 Mr. Andrew Anglin wanted his own P.O. box? 11:28:38

16 A. Because I was no longer going to allow 11:28:43  
17 mail to be sent to -- he had already ended sending 11:28:46  
18 mail to my office. 11:28:52

19 Q. And did you understand that mail would 11:28:53  
20 continue to be sent to the P.O. box instead of the 11:28:57  
21 6827 North High Street address that we talked about 11:29:02  
22 earlier? 11:29:05

23 A. I wasn't surprised when it was, but we 11:29:07  
24 didn't really talk about where he was going to send 11:29:10  
25 it. So I wasn't surprised, but we didn't talk about 11:29:14

1 GREGORY ANGLIN

2 it. 11:29:17

3 Q. And did you have an understanding as to 11:29:18

4 where people would know to send mail for Mr. Andrew 11:29:22

5 Anglin, like, where would they get that information? 11:29:26

6 A. Well, I think it was on his website, but I 11:29:29

7 don't know that for sure. 11:29:32

8 Q. What website are you referring to? 11:29:34

9 A. That would be DailyStormer.com. 11:29:36

10 Q. So it's your understanding that at some 11:29:38

11 point the address on the website changed from 6827 11:29:40

12 North High Street, Suite 121, to a P.O. box? 11:29:43

13 A. That is correct. 11:29:50

14 Q. And whose responsibility was it to 11:29:54

15 retrieve mail from the P.O. box? 11:29:58

16 A. I retrieved the mail from the P.O. box. 11:30:01

17 Q. And how regularly did you retrieve mail 11:30:04

18 from the P.O. box? 11:30:06

19 A. It was sporadic. Somewhere between once a 11:30:08

20 week and once a month. 11:30:14

21 Q. And what type of mail would you retrieve? 11:30:15

22 A. I received money from readers of the Daily 11:30:19

23 Stormer. I received correspondence from attorneys, 11:30:31

24 and I don't recall anything else. 11:30:38

25 Q. Okay. Let's take them in reverse order. 11:30:44



1 GREGORY ANGLIN

2 A. Okay. 11:30:47

3 Q. The correspondence you received from 11:30:47

4 attorneys based on your earlier testimony, I 11:30:49

5 understand that went into the tub? 11:30:52

6 A. That's correct, yes, sir. 11:30:54

7 Q. And I would like to understand what 11:30:55

8 happened to the money that was received at the P.O. 11:30:58

9 box? 11:31:01

10 A. What happened to the money that was 11:31:02

11 received at the P.O. box? 11:31:03

12 Q. Yes, sir. 11:31:04

13 A. It was -- let me think for a minute. The 11:31:06

14 money received at the P.O. box, I think that this is 11:31:15

15 the time period at which Chase would not -- Chase 11:31:23

16 would not accept cash deposits. So if there was 11:31:33

17 cash, I would deposit it into my account, and then 11:31:36

18 write a check to Andrew for the same amount. And 11:31:40

19 then checks, I would deposit into the account. 11:31:44

20 Q. Okay. I'll break that down to make sure I 11:31:47

21 understand it. The cash deposits that would come in 11:31:50

22 to the P.O. box, you would deposit them into your 11:31:53

23 account? 11:31:56

24 A. At some point I did. There may have still 11:31:59

25 been a time when I was taking them directly to Chase, 11:32:01

1 GREGORY ANGLIN

2 and they were accepting cash. But Chase changed 11:32:04  
3 their banking policy to no longer accept cash. So at 11:32:07  
4 some point, I would deposit the money in to my 11:32:10  
5 account, write a check for the exact same amount, and 11:32:12  
6 deposit it into Andrew's account. 11:32:15

7 Q. Okay. And which account would you deposit 11:32:18  
8 the cash into, at what bank? 11:32:21

9 A. That would have been Huntington Bank, I 11:32:31  
10 believe. 11:32:34

11 Q. And the checks that you would write to 11:32:35  
12 Mr. Andrew Anglin were written from what bank? 11:32:37

13 A. From Huntington Bank. 11:32:41

14 Q. And when Huntington Bank closed your 11:32:46  
15 account how did your practice change, if at all? 11:32:48

16 A. I think by then -- I don't recall with 11:32:56  
17 certainty, but I think by then he had stopped -- let 11:33:01  
18 me think. It's so hard. Could you ask the question 11:33:05  
19 again? I'm sorry. 11:33:15

20 Q. Certainly. When Huntington Bank closed 11:33:16  
21 your accounts how did your practice of depositing 11:33:19  
22 cash change? 11:33:22

23 A. I don't believe I deposited -- I didn't 11:33:29  
24 deposit any cash beyond that date. 11:33:37

25 Q. Okay. You would not have deposited cash 11:33:40

1 GREGORY ANGLIN

2 into the account at FC Bank? 11:33:43

3 A. I don't believe I ever did. 11:33:51

4 Q. What gives you certainty about that? 11:33:54

5 A. I don't have certainty about it. But I 11:33:58

6 just think that we were winding up that whole cash 11:34:00

7 thing. 11:34:05

8 Q. Sir, I don't understand what you mean by 11:34:13

9 winding up -- we were winding up that whole cash 11:34:15

10 thing. Who is the we? 11:34:18

11 A. We would be me. I just need to think for 11:34:21

12 just a minute. I'm sorry. 11:34:25

13 Q. Please. 11:34:26

14 A. Starting in March -- I just want to make 11:34:56

15 sure I understand the question completely. I'm 11:35:04

16 sorry, I think I'm getting a little bit tired here. 11:35:06

17 But go ahead. 11:35:08

18 Q. Certainly. I have no problem repeating 11:35:10

19 it, sir. 11:35:12

20 A. Okay. Thank you. I don't want to be 11:35:12

21 annoying to you. 11:35:14

22 Q. You're not annoying. 11:35:15

23 A. Okay. 11:35:16

24 Q. You deposited cash received to the P.O. 11:35:16

25 Box into Huntington Bank and then wrote a 11:35:18

1 GREGORY ANGLIN

2 corresponding check to Mr. Andrew Anglin for that 11:35:22

3 amount, correct? 11:35:26

4 A. That's correct. 11:35:26

5 Q. At some point in time, Huntington Bank 11:35:27

6 closed your accounts, correct? 11:35:30

7 A. That's correct. 11:35:32

8 Q. And so I would like to understand what you 11:35:33

9 did with the cash that came into the P.O. Box after 11:35:35

10 Huntington Bank closed your account. 11:35:38

11 A. I think I just let it sit until about 11:35:44

12 April of this year, 2018, when I was doing a real 11:35:51

13 estate rehab, and I borrowed some money from my son. 11:35:59

14 And so he had some cash that had accumulated. I 11:36:02

15 borrowed that money, and then I paid it back later in 11:36:06

16 the year. 11:36:08

17 Q. Okay. And what was the amount that you 11:36:09

18 borrowed in April of this year for the real estate 11:36:11

19 rehab? 11:36:13

20 A. I misspoke. Thank you. It was actually 11:36:14

21 last year, it was 2017. 11:36:17

22 Q. Okay. 11:36:20

23 A. I borrowed -- I know the exact amount -- I 11:36:21

24 borrowed \$60,038 from him early -- during the summer, 11:36:25

25 probably, of 2017. And then I deposited -- when I 11:36:31

1 GREGORY ANGLIN

2 paid him back at the end of 2017, I wrote him a 11:36:37  
3 check. And I don't recall making any -- doing 11:36:40  
4 anything with cash other than perhaps there was a few 11:36:43  
5 hundred dollars that trickled in that were still in 11:36:46  
6 an envelope of his. 11:36:49

7 Q. Okay. Let's sort of go over all those 11:36:51  
8 pieces of information separately. 11:36:53

9 A. Okay. 11:36:55

10 Q. The \$60,000 loan you received, that was in 11:36:55  
11 the form of cash that had accumulated and was left 11:37:01  
12 undeposited? 11:37:04

13 A. I took it over time while I was doing 11:37:05  
14 this. I underestimated how much money it would cost 11:37:07  
15 to do this rehab. So I called Andrew and I said, can 11:37:15  
16 I borrow some of this money for a few months, some of 11:37:19  
17 your money. And he said sure. So I borrowed it, 11:37:22  
18 like 5,000 here, 5,000 there. I never knew for sure 11:37:24  
19 how much more I was going to need, but I would borrow 11:37:31  
20 it from him, yes. 11:37:33

21 Q. How are you certain about the aggregate 11:37:35  
22 amount? I believe you said \$60,038. 11:37:37

23 A. Yes, I was real careful. Andrew had an 11:37:40  
24 envelope with foreign currency. Andrew had an 11:37:46  
25 envelope with United States currency, and I had an 11:37:50

1 GREGORY ANGLIN

2 envelope. And when I took money in a loan from 11:37:54

3 Andrew, I would write it down on my envelope, the 11:37:57

4 date and the amount of money that I took. 11:38:00

5 Q. And these envelopes you're referencing in 11:38:02

6 your answers, where were they physically located? 11:38:04

7 A. They were located at a security box at FC 11:38:11

8 Bank. 11:38:22

9 Q. In whose name is the security box in? 11:38:22

10 A. In mine. 11:38:24

11 Q. Okay. And what is in the security box 11:38:26

12 today that relates to Mr. Andrew Anglin? 11:38:30

13 A. Some currency, I would guess -- I don't 11:38:35

14 know the exact amount. Most of it is foreign. About 11:38:40

15 \$2,000 would be my guess. I don't know. 11:38:43

16 Q. Of foreign currency? 11:38:46

17 A. That's correct. 11:38:49

18 Q. What's in the security box that relates to 11:38:49

19 Daily Stormer? 11:38:51

20 A. Nothing. 11:38:53

21 Q. What's in the security box that relates to 11:38:53

22 Moonbase? 11:38:55

23 A. Nothing. 11:38:56

24 Q. Other than the \$2,000 in foreign currency 11:38:57

25 is there anything else in the security box? 11:39:01

1 GREGORY ANGLIN

2 A. Some different personal possessions of 11:39:03  
3 mine. 11:39:05

4 Q. When you paid back Mr. Andrew Anglin the 11:39:12  
5 sum of \$60,038, was it a lump sum payment you made or 11:39:14  
6 did you pay it incrementally? 11:39:21

7 A. A lump sum payment. 11:39:23

8 Q. How did you make that payment? 11:39:24

9 A. I wrote a check from FC Bank and deposited 11:39:26  
10 it in his account. 11:39:30

11 Q. His account at Chase? 11:39:31

12 A. That's correct. 11:39:32

13 Q. And when did that occur? 11:39:33

14 A. December of last year, 2017. 11:39:36

15 Q. What is the last date in which you 11:39:38  
16 deposited money into the Chase account for Mr. Andrew 11:39:41  
17 Anglin? 11:39:44

18 A. I believe that was the last deposit. 11:39:46

19 Q. The 60,038? 11:39:48

20 A. Yes. Thank you. 11:39:52

21 Q. And the check that you wrote him was from 11:39:54  
22 your account at FC Bank? 11:39:55

23 A. That's correct. 11:39:57

24 Q. If we go back to Exhibit 8, sir, in the 11:40:00  
25 upper right-hand corner it says Box Number 208. Is 11:40:03

1 GREGORY ANGLIN

2 that consistent with your recollection as to where 11:40:09

3 you received mail for Mr. Andrew Anglin? 11:40:10

4 A. Yes, it is. 11:40:13

5 Q. And did you have any assistance in filling 11:40:14

6 out this form? 11:40:17

7 A. I mean, it's possible that I asked a 11:40:22

8 question of the woman at the post office. I don't 11:40:24

9 recall. 11:40:27

10 Q. Other than asking the person at the post 11:40:28

11 office, do you recall asking for anyone else's 11:40:30

12 assistance in completing the form? 11:40:34

13 A. No, I did not. 11:40:37

14 Q. Did you get the form at the post office or 11:40:38

15 was it mailed to you? 11:40:40

16 A. I don't recall. 11:40:41

17 Q. Do you recall visiting the post office to 11:40:42

18 submit it? 11:40:45

19 A. I don't recall if I visited the post 11:40:51

20 office or -- my guess would be I dropped it off at 11:40:53

21 the post office, but I don't recall that act. 11:40:58

22 Q. If you look at item number one, it says: 11:41:00

23 This service is for (required selection), and the box 11:41:01

24 that is checked is business/organization use. Is 11:41:08

25 that correct? 11:41:12



1 GREGORY ANGLIN

2 A. That is correct. 11:41:12

3 Q. You checked that box? 11:41:13

4 A. Yes, I did. 11:41:14

5 Q. What business or organization were you 11:41:15  
6 checking that box for? 11:41:17

7 A. I think the business organization is 11:41:20  
8 Andrew Anglin. 11:41:22

9 Q. And is that an individual's name or is 11:41:24  
10 that a business name? 11:41:27

11 A. I guess it's both. It's my son's name, 11:41:28  
12 yeah. 11:41:31

13 Q. And then if you turn back to Exhibit 4, 11:41:32  
14 sir, the trade name registration? 11:41:34

15 A. Right. 11:41:38

16 Q. On January 10th, 2017, you registered the 11:41:38  
17 trade name Andrew Anglin on behalf of Moonbase 11:41:43  
18 Holdings, LLC, is that correct? 11:41:46

19 A. Yeah, that's correct. 11:41:49

20 Q. And two days later on Exhibit 8 you open a 11:41:50  
21 P.O. box on behalf of the trade name Andrew Anglin, 11:41:55  
22 is that correct? 11:41:59

23 A. Yes, I think that was his plan, yes. 11:42:00

24 Q. And the plan that you're referencing is to 11:42:02  
25 create a trade name for Moonbase Holdings called 11:42:08

1 GREGORY ANGLIN

2 Andrew Anglin, correct? 11:42:11

3 A. I don't know if it was for Moonbase 11:42:13

4 Holdings or how any of that works. This is just how 11:42:14

5 he asked me to set it up. 11:42:19

6 Q. If you look at the middle of Exhibit 4, 11:42:21

7 sir, you'll see it references Moonbase Holdings, LLC. 11:42:23

8 A. Um-hum. 11:42:27

9 Q. If you turn to the first page of Exhibit 4 11:42:28

10 under the column that says Name of Registrant it says 11:42:30

11 Moonbase Holdings, LLC, correct? 11:42:33

12 A. That's correct. 11:42:36

13 Q. And you knew that at the time you 11:42:36

14 submitted this form on January 10, 2017, right? 11:42:38

15 A. Yeah, yeah. 11:42:42

16 Q. If you turn back to Exhibit 8, the name of 11:42:43

17 the person who was applying for the P.O. Box on 11:42:49

18 behalf of trade name Andrew Anglin is yourself, 11:42:52

19 Gregory Anglin, correct? 11:42:57

20 A. Yes, that's correct. 11:42:59

21 Q. And the address listed is your office 11:42:59

22 address, is that correct? 11:43:02

23 A. That's correct. 11:43:02

24 Q. And the phone number listed is your phone 11:43:02

25 number, correct? 11:43:04

1 GREGORY ANGLIN

2 A. That's correct. 11:43:05

3 Q. And the email address listed is your email 11:43:05  
4 address, right? 11:43:08

5 A. That is correct. 11:43:09

6 Q. And under Photo I.D., you've checked Valid 11:43:10  
7 Driver's License, is that right? 11:43:15

8 A. That's correct. 11:43:17

9 Q. And the Photo I.D. number there, is that a 11:43:17  
10 reflection of your Driver's I.D. number? 11:43:21

11 A. I would presume it is. 11:43:23

12 Q. Okay. And then there's a reference to 11:43:25  
13 home or vehicle insurance policy. Is that your home 11:43:27  
14 or vehicle insurance policy? 11:43:30

15 A. Yes, it would be. 11:43:31

16 Q. Okay. And other than yourself, who else 11:43:32  
17 was authorized to receive mail at the P.O. box? 11:43:35

18 A. Well, I think the next page says just me. 11:43:38

19 Q. Was Mr. Andrew Anglin, your son, the 11:43:42  
20 individual, was he authorized to receive mail at the 11:43:45  
21 P.O. box? 11:43:49

22 A. No, he was not. 11:43:49

23 Q. He was not allowed to pick it up? 11:43:50

24 A. You have to register that in person, and 11:43:53  
25 he was never in the United States. 11:43:57

1 GREGORY ANGLIN

2 deposit box of which you're aware? 11:46:10

3 A. I'm only aware of one. 11:46:13

4 Q. And when did you open that safety deposit 11:46:15

5 box? 11:46:17

6 A. When I opened the account at that bank, so 11:46:24

7 I think that was sometime late in 2017. 11:46:28

8 Q. Okay. Did you previously have a safety 11:46:32

9 deposit box at Huntington Bank? 11:46:35

10 A. Yes, I did. 11:46:38

11 Q. Do you still have that? 11:46:39

12 A. No, I do not. 11:46:40

13 Q. When your accounts at Huntington Bank were 11:46:41

14 closed was the safety deposit box closed as well? 11:46:42

15 A. I closed it. They didn't ask me to close 11:46:47

16 it. 11:46:49

17 Q. You referenced earlier, sir, an envelope 11:46:50

18 on which you tracked the amount of money that you 11:46:53

19 were borrowing from your son. Does that envelope 11:46:56

20 still exist? 11:47:01

21 A. No. 11:47:01

22 Q. What happened to it? 11:47:02

23 A. That would have been thrown away when I 11:47:03

24 paid the 60,038 back. 11:47:06

25 Q. Did you pay back exactly \$60,038 or did 11:47:08

1 GREGORY ANGLIN

2 you pay any interest? 11:47:12

3 A. I did not pay interest, no. 11:47:14

4 Q. Have you borrowed any other sums from your 11:47:22

5 son? 11:47:24

6 A. No. 11:47:24

7 Q. On Item 2 for Exhibit 8, when you listed 11:47:33

8 Andrew Anglin, did you intend to denote your son, the 11:47:36

9 individual, or did you intend to denote the trade 11:47:43

10 name that was registered by Moonbase Holdings on 11:47:47

11 January 10th, 2017? 11:47:50

12 A. I didn't really have any intent either 11:47:53

13 way. I filled out the form the way that Andrew 11:47:55

14 Anglin asked me to. 11:47:58

15 Q. Okay. You checked the box 11:47:59

16 business/organization use -- 11:48:00

17 A. That's correct. 11:48:02

18 Q. -- rather than residential. 11:48:02

19 Did he tell you to do that? 11:48:04

20 A. He told me that I have to do that 11:48:06

21 because -- yes, he told me to do that. 11:48:08

22 Q. And did he have a copy of the form? 11:48:12

23 A. Apparently. 11:48:14

24 Q. Who sent it to him? 11:48:15

25 A. I didn't send it to him. I don't know. 11:48:17

1 GREGORY ANGLIN

2 Q. Were you talking to him on the phone while 11:48:19  
3 you were filling out the form? 11:48:21

4 A. I don't remember. 11:48:29

5 Q. Do you still receive mail at 208? 11:48:42

6 A. Mail still goes to P.O. Box 208. I don't 11:48:48  
7 collect it any longer. 11:48:51

8 Q. Who collects it? 11:48:53

9 A. Nobody to my knowledge. 11:48:54

10 Q. And when did you stop collecting mail at 11:48:55  
11 P.O. Box 208? 11:48:57

12 A. I'm bad at time frames. Maybe a couple 11:49:03  
13 months ago. 11:49:05

14 Q. Why did you make that decision? 11:49:05

15 A. I just didn't want to do it any more. 11:49:07

16 Q. Do you know if the P.O. Box still contains 11:49:11  
17 cash contributions? 11:49:15

18 A. There had not been cash contributions for 11:49:17  
19 quite a long time, so I would be surprised. 11:49:19

20 Q. But you don't know, because you haven't 11:49:24  
21 visited the P.O. box? 11:49:26

22 A. That's correct. 11:49:28

23 (Plaintiff's Exhibit 9 was marked for 11:49:28  
24 identification.) 11:49:28

25 Q. Okay. Mr. Anglin, I'm handing you a 11:49:32

1 GREGORY ANGLIN

2 information. 12:08:04

3 A. Yes, sir. 12:08:04

4 Q. Sir, you talked about the loan that was 12:08:05

5 made to you from funds sent to Andrew Anglin the 12:08:09

6 \$60,038? 12:08:13

7 A. Um-hum. 12:08:15

8 Q. And you referenced a real estate rehab 12:08:15

9 project, is that correct? 12:08:19

10 A. That's correct. 12:08:20

11 Q. Was that rehab project related in any way 12:08:20

12 related to Mr. Andrew Anglin? 12:08:23

13 A. No, it was not. 12:08:24

14 Q. Related in any way to Moonbase Holdings? 12:08:26

15 A. No, it was not. 12:08:28

16 Q. Was it related to Daily Stormer? 12:08:29

17 A. No, it was not. 12:08:31

18 Q. Was it associated with your personal 12:08:32

19 business affairs? 12:08:34

20 A. Yes, sir, it was. 12:08:35

21 Q. And was that real estate rehab associated 12:08:36

22 with property here in Columbus, Ohio? 12:08:39

23 A. Yes, it was. 12:08:41

24 Q. Is that project complete? 12:08:44

25 A. Yes, sir, it is, finally. 12:08:46

1 GREGORY ANGLIN

2 121, Worthington, Ohio?

12:16:17

3 A. Yes, I see that.

12:16:19

4 Q. And on top of that it says, "And snail

12:16:20

5 mail for cash (any currency), checks, money orders,

12:16:22

6 and so on." Is that what it says?

12:16:29

7 A. That is what it says.

12:16:32

8 Q. And underneath it lists the address

12:16:33

9 associated with your consulting business, correct?

12:16:35

10 A. That's correct.

12:16:39

11 Q. We talked about cash, and we talked about

12:16:41

12 foreign currency. We didn't talk about money orders.

12:16:43

13 Did you ever receive money orders at that address?

12:16:47

14 A. Yes, I did.

12:16:49

15 Q. And how did you treat those?

12:16:50

16 A. Well, just like a check.

12:16:53

17 Q. You would deposit them into the Chase

12:16:56

18 account?

12:16:59

19 A. That's correct.

12:16:59

20 Q. Or on occasion you would deposit them into

12:17:00

21 your Huntington Bank account and then send a check to

12:17:02

22 Mr. Anglin for the corresponding amount?

12:17:06

23 A. Well, only with cash.

12:17:08

24 Q. You would only do that with cash?

12:17:09

25 A. That's correct.

12:17:13



1 GREGORY ANGLIN

2 Daily Stormer website? 12:20:10

3 A. No, I don't. 12:20:13

4 Q. Do you know if people who write for the 12:20:15

5 Daily Stormer get paid? 12:20:17

6 A. No, I don't know. 12:20:19

7 Q. Do you have any understanding as to what 12:20:24

8 happens to the money that is contributed to the Daily 12:20:25

9 Stormer? 12:20:27

10 A. No, I don't. 12:20:31

11 Q. Did you ever ask Andrew Anglin that 12:20:32

12 question? 12:20:35

13 A. No, I did not. 12:20:35

14 Q. You were depositing money in to his 12:20:38

15 account, correct? 12:20:41

16 A. I deposited money in to his account, yes, 12:20:44

17 sir. 12:20:46

18 Q. And you collected money from the P.O. box? 12:20:47

19 A. That's correct. 12:20:49

20 Q. You collected money from the 6827 North 12:20:49

21 High Street address? 12:20:52

22 A. That's correct. 12:20:53

23 Q. And you never asked him what's this money 12:20:54

24 for? 12:20:55

25 A. No, I never had a conversation with him 12:20:58

1 GREGORY ANGLIN

2 except before I borrowed the money, I asked him -- I 12:21:00  
3 just confirmed again, I said, this is your money. He 12:21:11  
4 said this is my money. 12:21:14

5 Q. And did you have an understanding 12:21:15  
6 independent of any conversation you might have had 12:21:18  
7 with him as to what the purpose of these 12:21:21  
8 contributions that were coming into these addresses 12:21:24  
9 was? 12:21:27

10 A. What the -- the purpose meaning why they 12:21:31  
11 sent them or what they were supposed to do -- what he 12:21:34  
12 was supposed to do with the money? 12:21:36

13 Q. We can talk about both. Let's talk about 12:21:38  
14 the first concept first. Why do you understand 12:21:40  
15 people were sending money? 12:21:42

16 A. I think it was primarily readers of the 12:21:44  
17 site that were sending him money. 12:21:47

18 Q. The Daily Stormer website? 12:21:50

19 A. That is correct, readers of the Daily 12:21:52  
20 Stormers website were sending Andrew money. 12:21:54

21 Q. And what about the second question, what 12:21:58  
22 was going to be done with the money; what did you 12:21:59  
23 understand to happen? 12:22:01

24 A. You know, I don't know what he does with 12:22:02  
25 his money. 12:22:03

GREGORY ANGLIN

Q. And did you have any belief or opinion as to what was going to occur with the funds that were sent to the addresses we've talked about today?

A. No, I did not.

Q. Sir, are you paying your own legal fees in connection with this deposition?

A. Yes, I am.

Q. Do you intend to seek reimbursement from your son?

A. No, I do not.

MR. QURESHI: I have no further questions.

MR. TYACK: Thank you.

MR. QURESHI: Thank you for your time, Mr. Anglin.

THE VIDEOGRAPHER: It's 12:21, we're off the record.

(Signature Not Waived.)

- - -

(DEPOSITION CONCLUDED AT 12:21 P.M.)

1 GREGORY ANGLIN

2 CERTIFICATE

12:25:44

3 State of Ohio :

12:25:44

SS:

12:25:44

4 County of Franklin:

5 I, Jackie Olexa White, Notary Public in  
6 and for the State of Ohio, duly commissioned and  
7 qualified, certify that the within named GREGORY  
8 ANGLIN was by me duly sworn to testify to the whole  
9 truth in the cause aforesaid; that the testimony was  
10 taken down by me in stenotypy in the presence of said  
11 witness, afterwards transcribed upon a computer; that  
12 the foregoing is a true and correct transcript of the  
13 testimony given by said witness taken at the time and  
14 place in the foregoing caption specified.

15 I certify that I am not a relative,  
16 employee, or attorney of any of the parties hereto,  
17 or of any attorney or counsel employed by the  
18 parties, or financially interested in the action.

19 IN WITNESS WHEREOF, I have set my hand and  
20 affixed my seal of office at Columbus, Ohio, on this  
21 13th day of November, 2018.

22  
23 \_\_\_\_\_  
JACKIE OLEXA WHITE, Notary Public  
in and for the State of Ohio  
24 and RPR-CM.

25 My Commission expires January 21, 2019.